

### **REMARKS**

Applicant has carefully reviewed and considered the Office Action mailed on July 20, 2006 and the references cited therewith.

Claims 1, 12, 13, 19, 24, 26 and 29 have been amended. No other claims have been amended, canceled or added. As result, claims 1-30 remain pending in the application.

#### **§ 103 Rejection of Claims 1-14 and 16-30**

On page 2 of the Office Action, claims 1-14 and 16-30 were rejected under 35 USC § 103(a) as being unpatentable over U.S. Patent No. 6,604,093 to Etzion et al. (Etzion) in view of U.S. Patent No. 5,321,837 to Daniel et al. (Daniel). Applicant respectfully traverses the rejection. Each of claims 1, 12, 13, 19, 24, 26 and 29 have been amended either to improve presentation or to better conform with its respective independent claim. Applicant submits that the scope of the amended claims have not been narrowed.

Claim 1 is directed to a system for notifying clients of job-related events of an event source. The system includes, among other things, a first trigger engine configured to register event requests, including a first event request from a first client and a second event request from a second client, and to concentrate the first and second event requests into a base event request, a second trigger engine configured to communicate with the first trigger engine to receive a registration of the base event request at the second trigger engine, and further configured to receive notification of an event of the event source corresponding to the base event, and upon receipt of an event instance corresponding to the base event from the event source, the second trigger engine communicates data indicative of the event instance to the first trigger engine, the first trigger engine being configured to determine to which of the one or more event requests the event instance corresponds.

Etzion relates to tools and methods for programming a computer system reaction to specified events and conditions (Etzion at col. 1, lines 7-11). Page 2 of the Office Action states that Etzion, at Fig. 2, step 40, discloses a first trigger engine configured to register event requests, a point which Applicant does not concede. Page 3 of the Office Action states that Etzion fails to disclose a second trigger engine. Further, page 3 of the Office Action states that Daniel discloses or suggests a second trigger engine.

Assuming *arguendo* that Etzion discloses a first trigger engine and that Daniel discloses a second trigger engine, neither Etzion nor Daniel discloses or suggests, either separately or in combination, that the second trigger engine is configured to communicate with the first trigger engine to receive a registration of a base event request at the second trigger engine, and that upon receipt of an event instance corresponding to the base event from an event source, the second trigger engine communicates data indicative of the event instance to the first trigger engine, the first trigger engine being configured to determine to which of the one or more of event requests the event instance corresponds, as required by claim 1. Applicant submits that the disclosures of Etzion and Daniel are completely silent regarding a first trigger engine and a second trigger engine cooperating in a manner, as required by claim 1. That is, Etzion and Daniel fail to disclose or suggest a second trigger engine configured to communicate with the first trigger engine to receive a registration of the base event request at the second trigger, and upon receipt of an event instance corresponding to the base event from the event source, the second trigger engine communicating data indicative of the event instance to the first trigger engine.

To establish a *prima facie* case of obviousness, the Examiner must meet three criteria. First, there must be some motivation or suggestion, either in the references themselves, or in the knowledge generally available to one of ordinary skill in the art, to combine the references. Second, there must be a reasonable expectation of success, and finally, the prior art references must teach or suggest all the claim limitations. The Examiner bears the initial burden of providing some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." MPEP 2142.

Page 3 of the Office Action states that, "It would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Etzion at al. with [sic] registers multiple event requests that are grouped with similar requests into a base request, as taught by Daniel, in order to effectively, efficiently and cost reduced management of computer system's [sic] event streams." Applicant submits that the motivation to combine Etzion with Daniel provided by the Office Action would not satisfy the deficiencies of both references with respect to not disclosing or suggesting that the second trigger engine is configured to communicate with

the first trigger engine to receive a registration of the base event request at the second trigger engine, and upon receipt of an event instance corresponding to the base event from the event source, the second trigger engine communicating data indicative of the event instance to the first trigger engine, as required by claim 1.

Further, Applicant submits that claim 1 is also patentable over the cited references for other reasons. For example, a base event, as described in the specification is a grouping of similar or related events that allow for multiple events to be communicated as a single base event (see specification at page 21, lines 9-10, and Fig. 4). Etzion discloses a method for situation management by which a composite event may be specified as a combination of two or more predefined component events and a rule, which causes a reaction to be invoked upon an occurrence of the composite event subject to a given condition (Etzion at Abstract, lines 1-5). Etzion discloses defining complex events using event composition operators applied to simple events, or other complex events (Etzion at col. 8, lines 58-62). Table II at col. 9 of Etzion provides an example of complex event compositions. A composite event of Etzion is not a grouping of similar or related events that allow for multiple events to be communicated as a single base event. Instead, Etzion discloses that the events occur individually and are examined to determine whether conditions for a specified composite event have been satisfied. Therefore, Applicant submits that specifying a composite event as taught by Etzion is not equivalent to registering a base event request. Therefore, Applicant submits that Etzion is completely silent regarding any disclosure or suggestion of a second trigger engine configured to communicate with a first trigger engine to receive a registration of a base event request at the second trigger engine, as required by claim 1.

Daniel discloses an event handling mechanism that categorizes events from a raw event stream into groups of events and associates one or more actions with each group (Daniel at col. 1, lines 7-11). However, Daniel fails to satisfy the deficiencies of Etzion. For example, Daniel fails to disclose or suggest receiving a registration of a base event request at the second trigger engine, as required by claim 1.

Applicant submits that, for at least the reasons discussed above, the prior art references do not teach or suggest all of the claim limitations of claim 1. Therefore, Applicant respectfully requests that the rejection of claim 1 be withdrawn. Further, claims 2-14 and 16-18 depend from claim 1 and are patentable over Etzion in view of Daniel for at least the reasons discussed with

respect to claim 1. Therefore, Applicant respectfully requests that the rejection of claims 2-14 and 16-18 be withdrawn.

Independent claim 19 is directed to a method for use in a computer network for notifying clients of events. The method includes, among other things, concentrating a first and a second event request into a base event request and registering the base event request at a remote server.

For at least reasons similar to those provided with respect to claim 1, Applicant submits that specifying a composite event as taught by Etzion is not equivalent to registering a base event. Etzion is completely silent regarding any disclosure or suggestion of registering a base event request at a remote server, as required by claim 19.

Daniel fails to satisfy the deficiencies of Etzion. For example, Daniel fails to disclose or suggest registering a base event request at a remote server, as required by claim 19.

Applicant submits that because neither Etzion nor Daniel discloses or suggests, either separately or in any combination, all of the features of claim 19, the Office Action fails to establish a prima facie case of obviousness. Therefore, Applicant respectfully requests that the rejection of claim 19 be withdrawn.

Claims 20-28 depend from claim 19, either directly or as a base claim. Applicant submits that claims 20-28 are patentable over Etzion in view of Daniel for at least the reasons discussed above with respect to claim 19. Therefore, Applicant respectfully requests that the rejection of claims 20-28 be withdrawn.

Independent claim 29 is directed to a system for running jobs in a network. The system includes, among other things, a switchbox configured to register event requests from a job scheduler component and to notify the job scheduler component upon occurrence of each event corresponding to an event request therefrom. The switchbox is further configured to register event requests from the job dispatcher component and to notify the job dispatcher component upon occurrence of each event corresponding to an event request therefrom. Upon being notified of an event, the job scheduler component determines which of a group of jobs are associated with the event and requests the running of one or more jobs associated with the event by triggering an event in the switchbox, wherein the switchbox provides the event to the job dispatcher component to cause execution of one or more jobs.

Applicant submits that neither Etzion nor Daniel discloses or suggests, either separately or in combination, a switchbox and a job scheduler component cooperatively working together as

recited in claim 29. That is, neither Etzion nor Daniel discloses or suggests a job scheduler component being notified of an event, determining which one of a group of jobs are associated with the event, requesting running of one or more jobs associated with the event by triggering an event in the switchbox, and the switchbox providing the event to a job dispatcher component to cause execution of the one or more jobs. Therefore, Applicant respectfully requests that the rejection of claim 29 be withdrawn.

Claim 30 depends from claim 29 and is patentable over Etzion in view of Daniel for at least the reasons discussed with respect to claim 29. Therefore, Applicant respectfully requests that the rejection of claim 30 be withdrawn.

Applicant notes that, with respect to the rejection of claims 19-30, the Office Action refers to the combination of Etzion and Brown. Applicant assumed that the Office Action intended to refer to Etzion and Daniel because these claims were rejected as allegedly being unpatentable over Etzion and Daniel, not over Etzion and Brown.

#### § 103 Rejection of Claim 15

Claim 15 was rejected under 35 USC § 103(a) as being unpatentable over Etzion and Daniel, as applied to claim 1 above, and in further view of U.S. Patent No. 6,658,485 to Baber et al. (Baber). Applicant respectfully traverses the rejection.

Claim 15 depends from claim 1 and is patentable over Etzion and Daniel for at least the reasons discussed with respect to claim 1. Baber relates to a computer system in which a sending or receiving application can dynamically change transmission priorities of queued messages (Baber at col. 1, lines 7-11). However, Applicant submits that Baber fails to satisfy the deficiencies of Etzion and Daniel. Therefore, Applicant respectfully requests that the rejection of claim 15 be withdrawn.

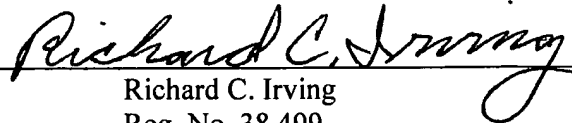
Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (425-707-9382) to facilitate prosecution of this application.

Respectfully submitted,

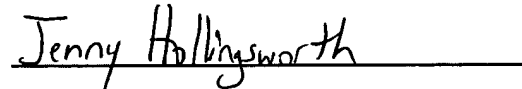
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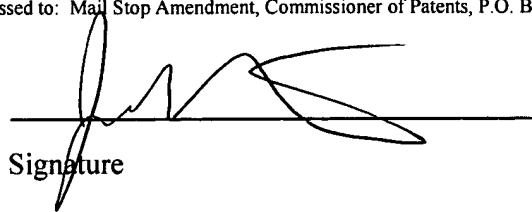


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